

ATTORNEY WORK PRODUCT

CONFIDENTIAL

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Monday, August 30, 2021 2:24 PM EDT
To: Steven R. Pounian <Spounian@kreindler.com>; John Fawcett <Jfawcett@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; Jim Kreindler <JKreindler@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

From: John Hartney
Sent: Thursday, July 29, 2021 12:29 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

If you look at the spreadsheet column ItemName it shows that he downloaded

/Dep Videos and Transcripts/Faisal al Muhanna

/Dep Videos and Transcripts/Majed al Mersal

/Dep Videos and Transcripts/Chas Freeman

/Dep Videos and Transcripts/Ismail Mana

/Dep Videos and Transcripts/Roy Olivier

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 12:23 PM
To: John Hartney <JHartney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

Yes please check to see if it was emailed to *anyone* outside of KK.

Of course we needed to know if it was sent to reporter Isikoff, but we will also be asked if it was sent to someone else who may have in turn sent it to Isikoff.

On the shared file server I see one download on July 5 by **Redacted** (one of our translators) but it does not say what was downloaded. Is there a way to know if he downloaded the Jarrah transcript?

From: John Hartney <JHartney@kreindler.com>
Sent: Thursday, July 29, 2021 12:17 PM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: RE: Sharefile 9/11 internal investigation

I thought you ask me if anyone had sent the email to that particular reporter I can go back and find instances that the transcript was to anyone

Attached is the activity on the on Julia's shared folder Dep Videos and Transcripts

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:51 AM
To: John Hartney <JHartney@kreindler.com>
Subject: FW: Sharefile 9/11 internal investigation

Hi John,

We need to prioritize with some urgency that you can confirm (possibly in a sworn declaration) that you checked outgoing email boxes for the KK lawyers and staff to see if anyone forwarded the Jarrah deposition transcript outside the firm.

You told me on Monday that you checked and found no such outgoing emails. But John Fawcett sent one to **Redacted** one of our authorized consultants and Debbie said she also emailed a copy to Dorthea Capaone at Baumeister. Shouldn't your search have found these two?

Next question with regards to the file share server. Julia gave me list of who has access to that data base (below). Is there any way to determine who accessed, downloaded and possibly emailed the Jarrah depo transcript from that data base?

From: Andrew J. Maloney <AMaloney@kreindler.com>
Sent: Thursday, July 29, 2021 11:44 AM
To: Andrew J. Maloney <AMaloney@kreindler.com>
Subject: FW: Sharefile

KSAX-0093

Case No.
03-md-1570

KK00689

ATTORNEY WORK PRODUCT

CONFIDENTIAL

Here is a list of everyone on the Sharefile with access to the Jarrah Dep.

Steve Pounian
Jim Kreindler
Megan Bennett
AJM
John Fawcett
Debra Pagan
John Hartney
Julia Sienski

Carolyn Martinez (Baumeister)
Robert Sheps
Gavin Simpson

Larry Dunham

[REDACTED]

Emile Nakhleh
Gary Schroen

[REDACTED]

Let me know if you need anything else.

Julia Sienski
Client Liaison.

Kreindler & Kreindler LLP

485 Lexington Ave
New York, NY 10017

T: 212.973.3492 · E-mail: jsienski@kreindler.com
F: 212.972.9432 · Web: www.kreindler.com

 Please consider the environment before printing this e-mail.

KK00690